

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA : CR-1-02-153
:
v. : **MOTION FOR REDUCTION**
: **OF SENTENCE, RULE 35(b)**
: **F.R.C.R.P.**
:
TODD W. KLEIN : J. Dlott

The defendant, Todd W. Klein, pled to an indictment on December 13, 2002, to one count of bank fraud, in violation of 18 U.S.C. § 1344, and two counts of interstate transportation of a motor vehicle, in violation of 18 U.S.C. § 2312. He was sentenced on January 28, 2004 to 14 months in prison and 5 years of supervised release. He was also ordered to pay \$51,947.58 in restitution and a \$300.00 special assessment. He did not appeal.

We submit that Klein has continued to cooperate with law enforcement authorities and provided information regarding the money laundering and narcotics distribution activities of others in the Southern District of Ohio.

Accordingly, the United States requests that this Court enter an order reducing the defendant's sentence in this case. Specifically, we request that this Court reduce the remainder of the defendant's sentence by four (4) months under Rule 35(b) due to the substantial assistance that the defendant has provided to the government. We suggest that the term of supervised release and fine imposed remain unchanged. We believe that a four month

reduction of the defendant's sentence would reward the defendant for his substantial assistance and not defeat the purpose of the original sentence.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Motion For Reduction Of Sentence, Rule 35(b), F.R.Cr.P" was served this 15th day of December, 2004, electronically on David J. Scacchetti, Attorney for Defendant Klein.

s/Kenneth L. Parker
KENNETH L. PARKER (0068805)
Assistant United States Attorney